

Commonwealth of Kentucky
Division for Air Quality
PERMIT STATEMENT OF BASIS

Title V draft/proposed permit No. V-00-001

BARTON BRANDS, LTD.

Bardstown, KY.

May 4, 2000

Danny Ballard, Reviewer

Plant I.D. # 104-3000-0020

AFS I.D. # 21-179-00020

Application Log # F471

SOURCE DESCRIPTION AND CONTROL EQUIPMENT:

- E. Unit 01: Grain handling operations: grain unloading/receiving hopper, screw conveyor, bucket elevators, storage bins, hammermilling, meal bins and cooking

- E. Unit 02: Grain cleaning: shaker screen, cyclone

- E. Unit 03: Fermentation process: fermentation vessels and evaporators stillage tanks

- E. Unit 04: Spent Grain Drying: three steam rotary dryers and cyclone separator

- E. Unit 05: Barrel filling, aging, dumping: barrel filling stations, barrel aging in warehouses, and barrel dumping

- E. Unit 06: Processing and bottling operations: holding, processing, and bottling tanks, bottle filling and pipeline components and peripheral equipment

- E. Unit 07: 40.4 MMBTU/hr Natural gas-fired indirect-heat-exchanger with #2 fuel oil as backup fuel

- E. Unit 08: 99.5 MMBTU/hr Spreader stoker coal-fired indirect-heat-exchanger with flyash reinjection and Multicyclone

- E. Unit 09: 40.4 MMBTU/hr Natural gas-fired indirect-heat-exchanger with #2 fuel oil as backup fuel

- E. Unit 10: Wastewater treatment process

BARTON BRANDS, LTD.
STATEMENT OF BASIS
PAGE TWO

REGULATION APPLICABILITY:

All the applicable regulations to the emission units are listed in the permit. The following regulation are not applicable based on the applicability date of regulation or unit size:

Regulation not applicable to Emissions Units 07, 08 and 09 due to applicability date and/or size of unit:

Regulation 401 KAR 60:005, incorporating by reference the federal regulation 40 CFR, Part 60, Subpart Db, Standards of performance for industrial-commercial-institutional steam generating units, applicable to an emissions unit of greater than 100 MMBtu/hour and constructed after June 19, 1984.

COMMENTS:

- The permittee has not proposed any alternate operating scenario for the emissions units.
- Unit 1 is subject to fugitive emissions Regulation 401 KAR 63:010 and is considered to be in compliance when using control measures required by the regulation.
- Any indirect heat exchanger burning natural gas is considered to be in compliance with PM, SO₂ and opacity standard.
- In order to ensure minor source status pursuant to Regulation 401 KAR 51:017, Prevention of Significant Deterioration of Air Quality, sulfur dioxide emissions from emissions unit 08 shall not exceed 249 tons in any consecutive twelve months period.
- The permittee will be required to conduct one particulate matter mass emission performance test for emissions unit 08 to demonstrate compliance with allowable particulate matter mass emission standard once within the term of this permit.
- The three hour averaging time associated with the particulate matter emission standards for emissions units 02, 04, 07, 08, and 09 are applicable during compliance demonstration when performance tests are required by the Division.
- The permittee may ensure compliance with the emissions limitations and standards conditioned within the permit for Emissions Units 07, 08, and 09 by performing the calculations based upon sulfur content, fuel usage and processing rates, and emission factor information. Additionally, the permittee is required to monitor the fuel consumption rates, processing rates, and operation of the unit's control equipment used to control emissions.
- No applicable regulations apply to Emissions Units 03, 05, 06, and 10; however, the permittee is required to monitor processing and production rates due to the emissions potential of each designated unit.

CREDIBLE EVIDENCE:

This permit contains provisions which require that specific test methods, monitoring or recordkeeping be used as a demonstration of compliance with permit limits. On February 24, 1997, the U.S. EPA promulgated revisions to the following federal regulations: 40 CFR Part 51, Sec. 51.212; 40 CFR Part 52, Sec. 52.12; 40 CFR Part 52, Sec. 52.30; 40 CFR Part 60, Sec. 60.11 and 40 CFR Part 61, Sec. 61.12, that allow the use of credible evidence to establish compliance with applicable requirements. At the issuance of this permit, Kentucky has not incorporated these provisions in its air quality regulations.